

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DONNA K. SOUTTER,
For herself and on behalf of all similarly
situated individuals,

Plaintiff,

v.

CIVIL ACTION NO. 3:10-cv-00107

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

DECLARATION OF ALICIA FLUELLEN

I, Alicia Fluellen, hereby make this Declaration under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Senior Director, Vendor Relationship Management, for Defendant Equifax Information Services LLC (“Equifax”). I formerly served as Director of Customer Care.

2. I am over the age of 21 years, have personal knowledge of the matters contained herein, and am otherwise competent to give this declaration. I give this declaration in support of Equifax’s Opposition to Plaintiff’s Amended Motion for Class Certification (“Plaintiff’s Motion”).

3. I am familiar with the Equifax documents generally referred to as ACIS cases.

4. An ACIS case is an electronic record that reflects the receipt of a dispute from a consumer and Equifax’s handling of the dispute. The ACIS case also reflects the information, if any, that was included in the relevant information field of dispute forms (called “ACDVs”) sent to data furnishers or public records vendors. The relevant information field describes the consumer’s dispute.

5. Included within the ACIS case record is a copy of any correspondence and supporting documentation that a consumer sends with the dispute.

6. I have reviewed Plaintiff's Motion, including the comment that "[t]he nature of the Consumer's communication and Equifax's communication in response are also easily determinable by the letters Defendant has archived." In order to review the letters and accompanying documentation in each ACIS case for each consumer that might be a potential class member in this case, it would be necessary to manually review each and every ACIS case to see exactly what was said in each dispute, what information was included in the relevant information field of the ACDV, and what supporting documentation, if any, was provided. Although a high level search could be done to obtain ACIS cases containing certain dispute codes, such a search would not permit a full understanding of the information in the relevant information field, dispute letters and supporting documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of April, 2013, at Atlanta, Georgia.

By: 
Alicia Fluellen